SHER TREMONTE

APPLICATION GRANTED
SO ORDERED *[signature]*
VERNON S. BRODERICK
U.S.D.J.

BY ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
40 Foley Square
New York, New York 10007

The parties are directed to submit a subsequent joint letter, noting the status of the case, by May 7, 2025.

Dated: June 4, 2024

Re: ***Bennett v. Cuomo, et al.*, No. 22 Civ. 7846 (VSB) (SLC)**

Dear Judge Broderick:

We represent defendant former Governor Andrew M. Cuomo in the above-referenced matter. In accordance with the Case Management Plan and Scheduling Order, we write jointly with defendants Melissa DeRosa, Jill DesRosiers, and Judy Mogul and with Plaintiff Charlotte Bennett to provide the Court with a status update and respectfully request that the Court adjourn *sine die* the post-discovery conference scheduled for May 31, 2024 in light of the fact that Magistrate Judge Cave extended the discovery deadlines to 2025 as set forth below. *See* ECF No. 76 at 2.

On June 28, 2023, the Court entered the Case Management Plan and Scheduling Order, which set certain discovery and post-discovery deadlines, including that discovery would be completed by May 24, 2024.[1] *Id.* Since then, however, Magistrate Judge Cave, to whom this case is referred to for general pretrial purposes, entered a Second Amended Case Management Plan, setting January 31, 2025 as the fact discovery deadline and April 30, 2025 as the expert discovery deadline. *See* ECF Nos. 82, 233.

Discovery is well underway and the parties anticipate meeting the deadlines in the Second Amended Case Management Plan.

In light of these circumstances, the parties respectfully request that the Court adjourn *sine die* the post-discovery conference scheduled for May 31, 2024.

Respectfully submitted,

/s/ Theresa Trzaskoma

Theresa Trzaskoma

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[1]Specifically, the Case Management Plan states that all discovery shall be completed no later than eleven months from June 27, 2023.